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January 16, 2020

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VIA USPS

Re: *Jenny G. Beard v. Town of Topsail Beach, Town of Topsail Beach Police Department and Officer Jacob Allen, in His Individual and Official Capacities, 7:19-cv-97*

Dear Mr. Anglin:

I write regarding the above captioned matter. We have received Plaintiff's Expert Witness Disclosures. These disclosures are grossly inadequate. Our objections to the Plaintiff's Expert Witness Disclosures accompany this correspondence.

The information provided in the Expert Witness Disclosures is inadequate. Rule 26(a)(2) requires that a written report from each identified expert accompany the Disclosure. The Expert Witness Disclosure served upon us does not contain any report.

Pursuant to Paragraph 9 of the Case Management Order [DE #22] for this case, and pursuant to Rule 26 of the Federal Rules of Civil Procedure, we respectfully object to the Expert Witness Disclosure and request that the Expert Witnesses Disclosure be supplemented to comply with the Scheduling Order and Rules of Civil Procedure.

As you know, our Expert Witness Disclosures are due for service on February 15. We cannot make adequate disclosure until and unless we have a complete and proper disclosure of Plaintiff's experts. We are willing to confer with you on this matter but believe that you should be able to understand from the Rules and the Scheduling Order what is needed for an adequate disclosure. We would appreciate your response to our objection within the next two weeks. We reserve the right to file a motion with the Court in the event that adequate disclosure is not made.

Along with the Objection, you will also find written discovery relative to the Expert Witness Disclosures. Please find attached Defendants Second Interrogatories and Request for Production of Documents. We look forward to receipt of your responses to this written discovery.

Christopher Anglin, Esq.

January 16, 2020

Do not hesitate to contact me with any questions or concerns regarding this letter, the Expert Witness Disclosures or this case. I thank you in advance for your attention. I look forward to your response and working with you toward the resolution of this litigation.

Best Regards,



Clay Allen Collier

CAC/kh

Enclosures